



Patrick Papalia
Member of New Jersey, New York
and Washington DC Bars
Certified by the Supreme Court of
New Jersey as a Civil Trial Attorney
ppapalia@archerlaw.com
201-498-8504 Direct
201-342-6611 Direct Fax

Archer & Greiner, P.C.
1211 Avenue of the Americas, Suite 2750
New York, NY 10036
212-682-4940 Main
856-795-0574 Fax
www.archerlaw.com

December 30, 2021

VIA ECF

Honorable Ronnie Abrams
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: **FRHUEB, Inc., v. De Freitas Abdala, et al.**
Civil Action No. 1:21-cv-07395 (SDNY)

Dear Judge Abrams:

This firm represents Plaintiff FRHUEB, Inc. ("Plaintiff") in the above-captioned matter. The Parties have worked out a temporary injunction order with Judge Katharine Parker's assistance which will resolve the pending injunction hearing, scheduled for January 12 and 13 (if necessary), 2022 until March 23, 2022. Please find the enclosed proposed interim temporary injunction order for Your Honor's review and entry, attached as **Exhibit A**.

The parties have a settlement conference with Judge Parker scheduled for March 17, 2022 to determine if a global settlement of the action is feasible. In the event the matter is not settled and the parties do not agree to extend the temporary and preliminary relief entered by consent, the pending injunction application will need to be heard by Your Honor. This correspondence is written to request that the Court adjourn the pending injunction hearing, scheduled for January 12 and 13 (if necessary), 2022, to a period between March 18, 2022 and March 23, 2022. If the Court's calendar does not permit the dates between this period we ask that the dates be set as soon as possible after March 23, 2022.

Respectfully submitted,
Patrick Papalia
PATRICK PAPALIA

Honorable Ronnie Abrams

December 30, 2021

Page 2

cc: Jeannette Carmadella, Arnold Lutzker (attorneys for Defendants)